

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

Rhinehart Railroad Construction, Inc.

Plaintiff,

v.

Enviva Pellets Hamlet, LLC

Defendant.

Civil Action No. 1:19-cv-03411-ELH

**MOTION TO STAY PROCEEDINGS PENDING
COMPLETION OF SETTLEMENT NEGOTIATIONS**

Plaintiff, through its undersigned counsel, hereby respectfully moves this Court to stay proceedings in order to complete settlement negotiations. The parties have reached an agreement to resolve the litigation and are working to reduce the agreement to writing. Although Defendant has not filed an Answer in this matter and no counsel has yet entered an appearance, Defendant, through its corporate counsel, has consented to this Motion. By consenting to this Motion, Defendant does not waive its right to contest the jurisdiction of this Court in this matter. Plaintiff anticipates filing a dismissal of this case with prejudice within thirty days. To allow the parties to complete their settlement negotiations, Plaintiff respectfully moves this Court to stay the proceedings for thirty days. A proposed Order is attached.

Respectfully submitted,

/s/

Raymond Thomas McKenzie, Jr.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of December, 2019, a copy of the foregoing document was served on Defendant via electronic mail as follows:

Robert Abbott, Associate General Counsel
Enviva
7200 Wisconsin Avenue, Suite 1000
Bethesda, MD 20814 USA
Robert.Abbott@envivabiomass.com

/s/

Raymond Thomas McKenzie, Jr.

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ORDER

Plaintiff, Rhinehart Railroad Construction, Inc., has moved this Court to stay this action for a period of thirty days to allow the parties to complete settlement negotiations.

IT IS ACCORDINGLY:

ORDERED, that Plaintiff's Motion is hereby granted.

This ____ day of _____, 2019.

The Honorable _____